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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CONTRARIAN CAPITAL MANAGEMENT, L.L.C., CONTRARIAN CAPITAL FUND I, L.P., CONTRARIAN DOME DU GOUTER MASTER FUND, LP, CONTRARIAN CAPITAL SENIOR SECURED, L.P., CONTRARIAN EMERGING MARKETS, L.P., BOSTON PATRIOT SUMMER ST LLC, POLONIUS HOLDINGS, LLC, E1 SP, A SEGREGATED ACCOUNT OF EMAP SPC, EMMA 1 MASTER FUND, L.P., and CONTRARIAN FUNDS, L.L.C.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19 Civ. 11018

Hon. Analisa Torres

JOINT STIPULATION OF PARTIAL DISMISSAL WITHOUT PREJUDICE

The parties to this action, through their respective counsel, and pursuant to Federal Rules of Civil Procedure 15(a)(2) and 41(a)(1)(A)(ii), hereby stipulate as follows:

- 1. All claims brought by Plaintiff Boston Patriot Summer St LLC are dismissed without prejudice.
- 2. All claims brought by Plaintiff E1 SP, A Segregated Account of EMAP SPC, are dismissed without prejudice.
- 3. All remaining claims brought by Plaintiff Emma 1 Master Fund, L.P., are dismissed without prejudice.
- 4. The following claims in the following amounts by the following Plaintiffs are also dismissed without prejudice:

| Plaintiff | Bond | Bond ISIN | Amount |
|-----------------------------------|--------------------------|--------------|-------------|
| Contrarian Emerging Markets, L.P. | 9.00% Bonds due 2023 | USP17625AA59 | \$98,400 |
| Contrarian Emerging Markets, L.P. | 11.95% Bonds due 2031 | USP17625AD98 | \$2,785,300 |
| Contrarian EM II, LP | 11.95% Bonds due 2031 | USP17625AD98 | \$214,700 |

- 5. Pursuant to the Court's May 7, 2020 scheduling order, Dkt. 51, by May 15, 2020, Plaintiffs shall file and serve a Second Amended Complaint conforming to the dismissal of the claims listed in paragraphs (1)-(4) and the parties' joint stipulation of partial dismissal so-ordered by the Court on May 4, 2020, Dkt. 49.
- The Republic's answer on file to Plaintiffs' Corrected First Amended Complaint,
 Dkt. 34, shall be deemed as its answer to Plaintiffs' Second Amended Complaint.
- 7. This Stipulation is not intended to, and does not, impact any party's claims or defenses as to any other claims brought by any other Plaintiff, or as to any claims brought by Plaintiffs Contrarian Emerging Markets, L.P., and Contrarian EM II, LP, other than as to the bonds listed above in the amounts listed above.
- 8. The parties shall bear their own fees and costs incurred in the prosecution or defense of the claims dismissed without prejudice pursuant to paragraphs (1)-(4).
- This Stipulation may be executed in separate counterparts, and counterparts may be executed in electronic form, each of which shall be an original.

Dated: May 7, 2020

New York, New York

Respectfully submitted,

/s/ Steven F. Molo

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Counsel for Defendant

SO ORDERED:

ANALISA TORRES United States District Judge

Dated: May 8, 2020

New York, New York